

## **EXHIBIT 1**

FRIDAY, MAY 26, 2023

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

\*\*CONFIDENTIAL BSA PORTIONS UNDER SEPARATE COVER\*\*

18 Videotaped deposition of James  
19 Dimon, held at the offices of JPMorgan Chase,  
20 383 Madison Avenue, New York, New York,  
commencing at 9:02 a.m. Eastern, on the above  
date, before Carrie A. Campbell, Registered  
Diplomate Reporter and Certified Realtime  
21 Reporter.

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1 a deferred prosecution agreement is?

2 MR. BUTTS: Objection.

3 You may answer.

4 THE WITNESS: Generally, yes.

5 QUESTIONS BY MR. SULLIVAN:

6 Q. And that means that you  
7 essentially plead guilty, but they don't do  
8 anything except take your money for a number  
9 of years. But if you do it again, it's  
10 more -- they can prosecute you for the  
11 original matter.

12 Do you understand that?

13 MR. BUTTS: Objection.

14 You may answer.

15 THE WITNESS: I'm not a lawyer,  
16 but generally I understand it that  
17 way, yes.

18 QUESTIONS BY MR. SULLIVAN:

19 Q. Most of us lawyers don't  
20 understand it. It's what it is.

21 MR. SULLIVAN: Thank you, sir.

22 That's all I have.

23 MR. BUTTS: Thank you.

24 MR. SULLIVAN: Have a good day.

25 Nice holiday. I have to go. I have a

1 trial Monday. Take care.

2 MR. BUTTS: Sounds like no  
3 holiday for you.

4 MS. FRIEDMAN: Should we take a  
5 break?

6 MR. BUTTS: Yeah, let's do.

7 VIDEOGRAPHER: We're going off  
8 record. The time is 10:30.

9 (Off the record at 10:30 a.m.)

10 VIDEOGRAPHER: We're going back  
11 on record. The time is 10:39.

12 DIRECT EXAMINATION

13 QUESTIONS BY MS. SINGER:

14 Q. Good morning, Mr. Dimon. My  
15 name is Linda Singer. I would like to say I  
16 bring down the average age of the examiners  
17 on our side, but I don't know that that's  
18 true, actually, so I'm going to skip that.

19 I don't think we did this at  
20 the outset, so could you state your position  
21 for the record, please?

22 A. I am chairman and chief  
23 executive officer of JPMorgan Chase.

24 Q. And where generally do you  
25 reside?

1 A. New York City.

2 Q. And do you have any plans of  
3 moving your residence between now and  
4 November of 2023?

5 A. No.

6 Q. When did you first learn that  
7 Jeffrey Epstein was a customer of JPMorgan?

8 A. I don't recall knowing anything  
9 about Jeffrey Epstein until the stories broke  
10 sometime in 2019. And I was surprised that I  
11 didn't even -- had never even heard of the  
12 guy, pretty much, and how involved he was  
13 with so many people.

14 Q. Were you aware that Jeffrey  
15 Epstein was promoting you to contacts as a  
16 candidate for Secretary of the Treasury?

17 MR. BUTTS: Objection.

18 You may answer.

19 THE WITNESS: Nope.

20 QUESTIONS BY MS. SINGER:

21 Q. Were you aware that JPMorgan  
22 entered into a settlement or settlements with  
23 Jeffrey Epstein?

24 A. Not until recently, no.

25 Q. When did you learn that?

1 Q. And what did you rely on to  
2 state that JPMorgan did not have  
3 contemporaneous knowledge of Epstein's  
4 offenses?

5 MR. BUTTS: Objection.

6 THE WITNESS: I didn't say  
7 that.

8 QUESTIONS BY MS. SINGER:

9 Q. Okay. You did say hindsight is  
10 fabulous, correct?

11 A. I did.

12 Q. Okay. So prior to your  
13 interview, what information did you have  
14 about what JPMorgan knew or didn't know about  
15 Jeffrey Epstein and JPMorgan's handling of  
16 his accounts?

17 MR. BUTTS: Objection. And  
18 I'll instruct you not to answer to the  
19 extent that any knowledge comes from  
20 counsel.

21 THE WITNESS: I knew very  
22 little about any of this until this  
23 case was opened. And then of course  
24 I've learned quite a bit since then.

25

1       QUESTIONS BY MS. SINGER:

2           Q.        Okay. So in making your  
3       comment that hindsight is fabulous, what  
4       information had you reviewed about what  
5       JPMorgan knew or didn't know about its  
6       handling of Jeffrey Epstein's business?

7           MR. BUTTS: Objection.

8           And the same caution, you  
9       should not reveal any information you  
10      reviewed in the context of discussions  
11      with counsel.

12           THE WITNESS: Well, I mean,  
13      almost all of it was done in  
14      consultation with counsel.

15           MR. BUTTS: Then you can't  
16      answer the question.

17           THE WITNESS: Okay.

18       QUESTIONS BY MS. SINGER:

19           Q.        Other than conversations with  
20      your lawyers, which I never mean for you to  
21      reveal, nor would Mr. Butts allow you, did  
22      you have any knowledge of what JPMorgan had  
23      done or knew about Jeffrey Epstein prior to  
24      your interview with CNN?

25           MR. BUTTS: Objection.

1 You may answer.

2 THE WITNESS: I don't recall  
3 the specific knowledge I had before I  
4 sat down with counsel relating to  
5 these lawsuits.

6 QUESTIONS BY MS. SINGER:

7 Q. And --

8 A. And that was after I sat down  
9 with counsel.

10 MR. BUTTS: The interview was  
11 after --

12 THE WITNESS: The interview was  
13 after I spent considerable time with  
14 counsel.

15 QUESTIONS BY MS. SINGER:

16 Q. And apart from your preparation  
17 in connection with this litigation, how much  
18 time have you spent personally looking at the  
19 bank's conduct with respect to Jeffrey  
20 Epstein?

21 MR. BUTTS: Objection to form.

22 THE WITNESS: Before these  
23 lawsuits and the time with counsel,  
24 very little.

25

1 A. No.

2 Q. Okay.

3 MR. BUTTS: Are you finished  
4 with this document?

5 MS. SINGER: Yes, if y'all want  
6 a break.

7 MR. BUTTS: Hold on. I think  
8 it's been an hour. It's 11:40.

9 What's -- do you want --

10 THE WITNESS: I eat at 12, so  
11 let's go right to -- let's wait until  
12 12 to eat lunch.

13 MR. BUTTS: Yeah, there it is.  
14 (Dimon Exhibit 11 marked for  
15 identification.)

16 QUESTIONS BY MS. SINGER:

17 Q. Okay. All right. Let's go to  
18 Exhibit 11, which is going to be  
19 JPM-SDNYLIT-0006171.

20 All right. This document is an  
21 e-mail between Jes Staley and Jeffrey  
22 Epstein, correct?

23 A. Yes.

24 Q. Okay. And it's dated  
25 August 30, 2009, at the very top, correct?

1 A. Yes.

2 Q. Prior to your preparation for  
3 this deposition, had you seen this e-mail  
4 before?

5 A. No.

6 Q. And if we go to the middle of  
7 this e-mail, Jes Staley indicates to Jeffrey  
8 Epstein, "Back in the saddle Monday in London  
9 with Jamie mid-week."

10 Do you recall a trip to Jes  
11 Staley -- a trip to London with Jes Staley in  
12 August or September 2009?

13 A. Do I recall it, like, back  
14 then, no, but as a part of preparing for  
15 this. And my records are known, so you guys  
16 can just check.

17 And I think I went there for a  
18 big conference, not for Jes.

19 Q. Okay. But you don't have an  
20 independent recollection of a trip to London  
21 that Jes Staley was also on in August 2009,  
22 correct?

23 A. Correct.

24 Q. Okay. At the top of the -- I'm  
25 sorry. Towards the top of the e-mail,

1 Jeffrey Epstein asked Jes Staley, "How long  
2 London? Do you need anything there?"

3 And Jes Staley responds, "Yep."

6 A. Yes.

7 Q. Were you aware of this  
8 interaction between -- I'm sorry. Were you  
9 aware of -- I'm going to try one more time on  
10 this one.

14 MR. BUTTS: And is the question  
15 about your current awareness --

16 THE WITNESS: I'm neither  
17 currently aware, nor was I back .

18 QUESTIONS BY MS. SINGER:

19                   Q.               Okay.     So you

20 this exchange refers to, do you?

MR. WOHLGEMUTH: Objection.

22 THE WITNESS: Who objected?

23 MR. BUTTS: That's -- that's --

24                   that's right. You can answer the  
25                   question. That's Mr. Staley's

1 counsel.

2 THE WITNESS: Oh.

3 Repeat the question?

#### 4 QUESTIONS BY MS. SINGER:

5 Q. Yes.

9 MR. WOHLGEMUTH: Objection.

10 THE WITNESS: No.

11 QUESTIONS BY MS. SINGER:

12 Q. Were you aware of -- are you  
13 currently -- are you currently aware that  
14 Jeffrey Epstein transferred \$3,000 to a woman  
15 named [REDACTED] on August 31st from Jeffrey  
16 Epstein's account at JPMorgan?

THE WITNESS: I was not aware.

22 QUESTIONS BY MS. SINGER:

23 Q. When did you first learn of the  
24 transfer that Jeffrey Epstein made to [REDACTED]?

25 MR. BITTS: Same objection and

1 instruction.

2 THE WITNESS: Only after being  
3 prepared for this.

4 QUESTIONS BY MS. SINGER:

5 Q. Okay. This wasn't -- and  
6 you've since come to understand that Jeffrey  
7 Epstein did make a transfer to a woman named  
8 [REDACTED] around this time, correct?

9 MR. BUTTS: Objection.

10 And you may ask {sic} that  
11 question based on your state of  
12 knowledge prior to starting your  
13 preparation for this deposition.

14 THE WITNESS: I do not know.

15 QUESTIONS BY MS. SINGER:

16 Q. Okay.

17 A. I don't know if it took place  
18 or didn't take place or...

19 Q. Are you aware of other  
20 transfers that Jeffrey Epstein made to women  
21 from his JPMorgan accounts?

22 MR. BUTTS: Same objection and  
23 instruction.

24 THE WITNESS: I was not aware.

25

1       QUESTIONS BY MS. SINGER:

2           Q.       And at no point prior to 2019  
3       did you become aware of Jeffrey Epstein's  
4       payments to women from his JPMorgan accounts.

5                   Is that correct?

6           A.       I don't recall being aware, no.  
7       And I don't know when I became aware of some  
8       of it, so...

9           Q.       Would you expect, in light of  
10      Jeffrey Epstein's sex offenses, that JPMorgan  
11      would pay special attention to payments he  
12      was making to women?

13                  MR. BUTTS: Objection. Form.  
14                  You may answer.

15                  THE WITNESS: I would expect my  
16      experts to review what they thought  
17      was appropriate to review.

18       QUESTIONS BY MS. SINGER:

19           Q.       And do you think that would  
20      include for a sex offender like Jeffrey  
21      Epstein paying for women -- paying women and  
22      recruiters for sex, that that would include  
23      review of his payments to women?

24                  MR. BUTTS: Objection to form.  
25                  You may answer.

1                           THE WITNESS: I would have  
2                           asked them to make sure they do proper  
3                           reviews of all things, yes.

4                           QUESTIONS BY MS. SINGER:

5                           Q.         And sitting here today, do you  
6                           have an opinion as to whether that would  
7                           include -- do you have a view as to whether  
8                           that would include looking at his transfers  
9                           of money to women?

10                          MR. BUTTS: Objection. And  
11                          objection to form.

12                          You may answer.

13                          THE WITNESS: My expectation  
14                          would be they would be looking at  
15                          things like that, among all of the  
16                          other things they looked at. And I  
17                          don't know if it was put in front of  
18                          the group. I don't know if they saw  
19                          it.

20                          QUESTIONS BY MS. SINGER:

21                          Q.         And when you refer to "group"  
22                          in your response, you don't know if that was  
23                          put in front of the group, what do you mean  
24                          by "group"?

25                          A.         The people who review these

1 types of things.

2 Q. Compliance, regulatory, the  
3 bankers --

4 A. Generally, yes.

5 Q. -- correct?

6 Okay. All right. On  
7 September 1, 2009, Jes Staley became CEO of  
8 JPMorgan's investment bank; is that right?

9 A. I'll accept the date from you.  
10 Yeah. I don't know -- I don't remember the  
11 exact date.

12 Q. Okay. But you do recall  
13 somewhere around there, he became CEO of  
14 JPMorgan's investment bank, correct?

15 A. Yes.

16 Q. And that was a change that you  
17 directed, Mr. Dimon?

18 A. Yes.

19 Q. Why did you -- well, was it a  
20 promotion?

21 A. I would say so, yes.

22 Q. Okay. And why did you direct  
23 that change?

24 A. I had -- for a whole bunch of  
25 reasons, I had to make a change. I wanted to

1       was -- had been a customer of the bank?

2           A.       I don't recall specifically.

3           Q.       Did somebody from the bank tell  
4       you that?

5           A.       Most likely my general counsel  
6       right there.

7           Q.       Now, when you found out that  
8       this person had been a customer of the bank  
9       and you found out that he had been engaged in  
10      this sex trafficking, did you, in your  
11      capacity as chief executive officer and  
12      chairman of the bank, try to find out what  
13      the facts had been concerning the bank's  
14      relationship to Mr. Epstein?

15                  MR. BUTTS: Objection to form.

16                  And for the moment, I'll let  
17       you do a yes -- a yes or no answer to  
18       the question.

19                  THE WITNESS: What is the  
20       question again?

21    QUESTIONS BY MR. BOIES:

22           Q.       After you found out that  
23       Jeffrey Epstein existed, that he'd been a sex  
24       trafficker and he'd been a customer of the  
25       bank, did you, in your capacity as CEO and

1 chairman, want to find out what the  
2 circumstances were concerning the bank's  
3 relationship to this man?

4 MS. FRIEDMAN: Can I just -- I  
5 just want to make sure of privilege.

6 THE WITNESS: This is  
7 privileged, yeah. I can --

8 MS. FRIEDMAN: Just give me a  
9 minute.

10 MR. BUTTS: Okay. Yeah, so you  
11 should not reveal anything you learned  
12 or -- in connection with Ms. Friedman,  
13 her staff or outside counsel.

14 THE WITNESS: Okay. What --

15 MR. BOIES: Remember, all I  
16 asked him is whether he wanted to find  
17 out. It's a yes or no question.

18 MR. BUTTS: Okay. I'll give  
19 you that yes or no. That's fine.

20 MS. FRIEDMAN: We're fine.

21 THE WITNESS: The protocol,  
22 what I did, was I asked my general  
23 counsel there, do what you got to do.  
24 Do everything.

25 It wasn't about whether I had

1 personal knowledge. It was about  
2 whether we, the company, were doing  
3 the right things.

4 MR. BUTTS: Okay.

5 THE WITNESS: And then after  
6 that, she did give me some of that  
7 information I didn't have before.

8 QUESTIONS BY MR. BOIES:

9 Q. In order to determine whether  
10 the company was, in your words, doing the  
11 right thing, did you, as chairman and chief  
12 executive officer, want to know what the  
13 facts were?

14 MR. BUTTS: Did you want to  
15 know what the facts were.

16 THE WITNESS: Did I want to  
17 know?

18 I wanted to know what I should  
19 know. I didn't spend hours and hours  
20 going through "the facts."

21 QUESTIONS BY MR. BOIES:

22 Q. Well, when you say you wanted  
23 to know what you should know, what did you  
24 think you should know?

25 A. That the company was properly

1 working with law enforcement, that we should  
2 look -- that we should make sure that it's in  
3 the general counsel's court and not somewhere  
4 in the bowels of the company, and if there  
5 were lessons learned, we should deploy those,  
6 too.

7 Q. Okay. Now, in terms of lessons  
8 learned and deploying those lessons, did you  
9 make an attempt to find out whether there  
10 were lessons to have been learned from this  
11 experience that would change your business  
12 practices?

13 A. Well, we're still in the  
14 process because we're obviously -- I'm being  
15 distracted doing this today, but I have never  
16 in my life not experienced a thing where you  
17 don't learn lessons and try to do better in  
18 the future than you did in the past.

19 Q. I agree with that.

20 And what did you do -- and  
21 again, I'm not asking you about what you did  
22 in this litigation and what you did for this  
23 litigation.

24 I'm simply asking, what did you  
25 do for your business? What did you do as

1 MR. BUTTS: Objection. Asked  
2 and answered.

3 THE WITNESS: I want you to  
4 review controls at banks around the  
5 world, other people, what we've done  
6 and haven't done, best practices, what  
7 we're allowed to do, what we're not  
8 allowed to do. And when you're ready,  
9 Stacey, come back to me and talk to me  
10 about it. Have other people in the  
11 room that would be happy to do it.

12 QUESTIONS BY MR. BOIES:

13 Q. When did you --

14 A. It's called delegation. I  
15 can't do that myself.

16 Q. Okay. When did you first ask  
17 your general counsel to begin this project of  
18 identifying best practices and how you could  
19 improve controls?

20 A. Well, we've been doing it my  
21 whole career when it comes to multiple  
22 things, including AML. The laws change, the  
23 requirements change, the regulations change.

24 About this particular matter?

25 About anything relating to the human

1       trafficking? I think that came up because of  
2       this case.

3                   Q.       And this case was filed a few  
4       months ago; is that correct?

5                   MR. BUTTS: Objection.

6                   THE WITNESS: I meant it came  
7       up as a result of the Epstein  
8       indictment, suicide.

9       QUESTIONS BY MR. BOIES:

10          Q.       Okay. Now, focusing on what  
11       you did before this litigation was filed,  
12       before the litigation was filed against Chase  
13       Bank, before that litigation was filed, were  
14       you concerned that the bank had any legal  
15       liability for what happened?

16                   MR. BUTTS: Objection.

17                   And you should not reveal any  
18       information or view you had based on  
19       discussions with counsel.

20                   MR. BOIES: This is still just  
21       a yes or no question.

22                   MR. BUTTS: It was not a yes or  
23       no question. You asked him about  
24       concern about legal liability.

25                   MR. BOIES: Well, I said did he

1 identification.)

2 QUESTIONS BY MR. BOIES:

3 Q. Let me ask you to look at a  
4 document that has been previously marked as  
5 Exhibit 114.

6 And the e-mail I'm interested  
7 in is the e-mail at the top which is from  
8 Paul Morris to Jeffrey Epstein, dated  
9 June 30, 2012, at 1:49 a.m.

10 Do you see that e-mail?

11 A. Yes.

12 Q. And it's a short e-mail, and  
13 I'll just read it for the record.

14 "Jeffrey, sorry for being so  
15 limited on the e-mails, but I guess I'm too  
16 discrete. Anyway, I really appreciate  
17 everything you're doing, and this is a  
18 fantastic opportunity that you are opening  
19 the door to. I briefed our CEO, and I think  
20 he will get a sense of the LB relationship  
21 over the weekend. Come back to you ASAP, and  
22 thank you again. Paul Morris, JPMorgan  
23 private bank."

24 Did Mr. Epstein help JPMorgan  
25 develop a relationship with Leon Black?

1 MR. BUTTS: Objection.

2 You may answer.

3 THE WITNESS: I don't know if  
4 that's what LB refers to.

5 We've -- I've known Leon Black  
6 for -- way before this, and the  
7 company has been doing business with  
8 Apollo for a long time. So we didn't  
9 need his introduction.

10 QUESTIONS BY MR. BOIES:

11 Q. You know Mr. Black?

12 A. I do know Mr. Black.

13 Q. Have you --

14 A. This could have been Limited  
15 Brands, and the CEO was unlikely not me --  
16 was likely not me.

17 MR. BUTTS: The testimony has  
18 been it's not you.

19 THE WITNESS: Right.

20 QUESTIONS BY MR. BOIES:

21 Q. Did you ever discuss  
22 Mr. Epstein with Mr. Black?

23 A. No.

24 Q. When was the last time you  
25 talked to Mr. Black?

1 (Dimon Exhibit 101 marked for  
2 identification.)

3 QUESTIONS BY MR. BOIES:

4 Q. I'm going to ask you to look  
5 next at Exhibit 104 -- 101.

6 This is an exchange of e-mails  
7 between Mr. Staley and Mr. Epstein on  
8 June 17, 2009.

9 Mr. Epstein writes Mr. Staley.  
10 "Peter will be staying at 71st Street over  
11 the weekend. Do you want to organize either  
12 you, or you and Jamie, quietly? Up to you."

13 Do you see that?

14 A. Yes.

15 Q. Did you meet with Mr. Epstein  
16 and/or Mr. Staley at 71st Street over the  
17 weekend?

18 A. Absolutely not.

19 Q. Do you know what Mr. Epstein is  
20 referring to here?

21 A. I think I've testified many  
22 times, I didn't know Jeff Epstein. I never  
23 met Jeff Epstein. I never went to his house.  
24 I never went to his island. And I do not  
25 know exactly what he's referring to here.

1                   Maybe -- I mean, I can surmise  
2                   that he wanted Jes to introduce me to him --  
3                   introduce me to him.

4                   Q.         Now, Mr. Staley responds the  
5                   next day to Mr. Epstein, saying, "Jamie is in  
6                   Asia. I just got back from London, and I'm  
7                   in Boston. Let me what's up for the weekend.  
8                   If I'm in the city, for sure."

9                   Do you have any explanation as  
10                  to why Mr. Staley would write that e-mail if  
11                  you had no contact at all with Mr. Epstein?

12                  MR. BUTTS: Objection.

13                  MR. WOHLGEMUTH: Objection.

14                  MR. BUTTS: You may answer.

15                  THE WITNESS: I have no idea.

16                  (Dimon Exhibit 102 marked for  
17                  identification.)

18                  QUESTIONS BY MR. BOIES:

19                  Q.         Let me ask you look -- to look  
20                  next at the document that's been previously  
21                  marked as Exhibit 102.

22                  And do you know who Lesley  
23                  Groff is, by any chance?

24                  A.         Not that I can recall.

25                  Q.         Have you seen her mentioned in

1 connection with Mr. Epstein?

2 A. No.

3 Q. Are you aware of whether or not  
4 she worked for Mr. Epstein?

5 A. Nope.

6 Q. On February 26, 2010, Lesley  
7 Groff writes Mr. Epstein on the subject of  
8 Peter, Jes and Jamie. "Shall I have Lynn  
9 prepare heavy snacks for your evening  
10 appointments with Peter Mandelson, Jes Staley  
11 and Jamie Dimon? Or is this to be a nice,  
12 sit-down dinner at 9 p.m.?"

13 And Mr. Epstein replies,  
14 "Snacks."

15 Do you see that?

16 A. Yes.

17 Q. Did you in fact have an  
18 appointment with Peter Mandelson, Jes Staley  
19 and Jamie Dimon?

20 A. I have never had an appointment  
21 with Jeff Epstein. I've never met Jeff  
22 Epstein. I never knew Jeff Epstein. I never  
23 went to Jeff Epstein's house. I never had a  
24 meal with Jeff Epstein. I have no idea what  
25 they're referring to here.

1 I did know Peter Mandelson, and  
2 obviously I knew Jes.

3 Q. Do you have an explanation why  
4 Lesley Groff would have written this e-mail?

5 MR. BUTTS: Objection.

6 You may answer.

7 THE WITNESS: Likely  
8 misinformed. Not likely.

9 Misinformed.

10 QUESTIONS BY MR. BOIES:

11 Q. Now, Mr. Epstein does not write  
12 back to her saying, you're misinformed, Jamie  
13 Dimon is not coming.

14 You see that?

15 A. I don't know what he thought at  
16 the time. He was obviously misinformed. I  
17 never -- this never took place.

18 Q. Okay. Did Mr. Epstein arrange  
19 for you to meet with Ehud Barak?

20 A. Who?

21 MR. BUTTS: Objection.

22 You may answer.

23 THE WITNESS: Who?

24 QUESTIONS BY MR. BOIES:

25 Q. Ehud Barak.

1                   A.         I don't think Jeff Epstein ever  
2 arranged for me to meet with anybody, to my  
3 knowledge. And I knew Ehud Barak. We did  
4 not need introductions to anybody.

5 (Dimon Exhibit 113 marked for  
6 identification.)

7 QUESTIONS BY MR. BOIES:

8 Q. Let me ask you to look at a  
9 document that has been previously marked as  
10 Exhibit 113.

This is a series of e-mails.

The one at the bottom, January 23, 2008, at 12:44 p.m., says, "Hello Rosa, I think [REDACTED] may have already e-mailed you, but wanted to follow up just in case. Jeffrey was talking to me on the phone and to [REDACTED] who was standing with him at the same time, so not sure which one of us was actually to e-mail you. Jeffrey requested that we give you the contact e-mail for Ehud Barak so that you could organize the meeting with Jamie Dimon and Barak on your end for simplification."

23                           And then Rosa writes to Jes  
24       Staley, "Jes, is it okay for me to contact  
25       Ehud Barak directly to arrange a meeting with

1 Is that not right?

2 A. That's what it lists. I don't  
3 know if it's true.

4 (Dimon Exhibit 22 marked for  
5 identification.)

6 QUESTIONS BY MS. SINGER:

7 Q. Okay. We're also going to take  
8 a look at Exhibit 22, JPM-SDNYLIT-00150148\_R.

9 Do you recognize Project Jeep,  
10 Mr. Dimon?

11 A. I do not.

12 Q. Okay. So this document is  
13 headed "Project Jeep - Client Review October  
14 2019."

15 Correct?

16 A. Yes.

17 Q. And have you seen this document  
18 before?

19 A. No.

20 Q. At the top --

21 A. Not that I recall.

22 Q. Okay. At the top, it indicates  
23 that it is reviewing three client  
24 relationships related to Jeffrey Epstein  
25 media.

1                      Correct?

2 A. Yes.

3 Q. Okay. And one of those, if you  
4 look about a third of the way down, is Leon  
5 Black, correct?

6 A. Yes.

7 Q. And if we turn to the second  
8 page, Bates number 148, you can see that the  
9 Leon Black relationship assets are valued at,  
10 when you add them together, \$465 million.

11 Is that correct?

12 A. That's what this says.

13 Q. And do you have any independent  
14 knowledge of the value of Leon Black's assets  
15 at JPMorgan in 2019?

16 A. I don't.

17 Q. Okay. You can put that one  
18 aside, please.

19 We saw on JPMorgan's privilege  
20 log for this deposition an October 4, 2019  
21 e-mail to you about Project Yellow.

22 Are you familiar with Project  
23 Yellow?

24 A. Not that I recall.

25 Q. Okay. You don't have any sense

1                   A.         Or what came out with Epstein  
2 before.

3                   Q.         So prior to 2015, were you  
4 aware of efforts at JPMorgan to launch a  
5 donor-advised fund with Bill Gates through  
6 The Gates Foundation?

7                   A.         I don't -- I was not, no.

8                   Q.         Okay. So I take it you also  
9 were not aware that Jeffrey Epstein played a  
10 role in those discussions?

11                  MR. BUTTS: Objection.

12                  You may answer.

13                  THE WITNESS: Oh, absolutely I  
14 was not aware. Nor do we need Jeff  
15 Epstein to talk to Bill Gates.

16 QUESTIONS BY MS. SINGER:

17                  Q.         Were you aware that Mary Erdoes  
18 and Jes Staley had regular communications  
19 with Jeffrey Epstein about that donor-advised  
20 fund?

21                  A.         I am now.

22                  MR. BUTTS: Objection.

23 QUESTIONS BY MS. SINGER:

24                  Q.         And were you aware that the  
25 hope was that donor-advised fund would reach

1 see," tomorrow, "TMR what is the extent of  
2 damage."

3 Do you have any recollection of  
4 Mary Erdoes arranging for you to invite Bill  
5 Gates to an event?

6 MR. BUTTS: Objection.

7 You may answer.

8 THE WITNESS: I don't recall  
9 the specific event. That happened  
10 typically, yes.

11 QUESTIONS BY MS. SINGER:

12 Q. Okay. Do you know Ace  
13 Greenberg?

14 A. I did. He's dead.

15 Q. I should have asked it in the  
16 past tense. I'm sorry.

17 And who did you know him to be?

18 A. The chairman of Bear Stearns.

19 And then when we bought Bear Stearns, he came  
20 over as an investment advisor.

21 Q. Okay. And you know him  
22 personally, or you knew him personally, I  
23 take it?

24 A. For 40 years.

25 Q. I'm sorry.

1                                  Did Ace Greenberg ever talk to  
2                                  you about his desire that JPMorgan retain  
3                                  Jeffrey Epstein as a client of the bank?

4                                  A.        He did not.

5                                  Q.        Okay. You've talked a little  
6                                  bit about Jes Staley's departure from  
7                                  JPMorgan and the terms and tenor of his  
8                                  departure.

9                                  Is one of the reasons for Jes  
10                                 Staley's departure from JPMorgan your  
11                                 understanding that Mr. Staley had made  
12                                 unauthorized statements to the press about  
13                                 the London Whale?

14                                MR. BUTTS: Objection.

15                                You may answer.

16                                THE WITNESS: That was a part  
17                                 of it.

18                                QUESTIONS BY MS. SINGER:

19                                Q.        And what were those statements,  
20                                 to your understanding?

21                                MR. BUTTS: Objection.

22                                You may answer.

23                                THE WITNESS: I don't recall  
24                                 specifically today.

25